

# SIL LEAD Combating Trafficking in Persons Compliance Plan

SIL LEAD is committed to ensuring that its employees, subcontractors, volunteers, and interns are aware of and abide by the U.S. Government's zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and 52.222-50(h) and in Mandatory Standard Provision M20 of ADS Chapter 303.

## A. Compliance Program

SIL LEAD's Combating Trafficking in Persons (CTIP) Compliance Program consists of:

1. Awareness Raising,
2. A Reporting Process,
3. A Recruitment and Wage Plan,
4. A Housing Plan,
5. Monitoring Procedures,
6. Investigations, and
7. Posting of the Policy.

### Awareness

SIL LEAD provides employees, subcontractors, interns, and volunteers with information about trafficking related prohibitions, the activities prohibited, and actions that will be taken should they violate these prohibitions. In addition to being given copies of SIL LEAD's Combating Trafficking in Persons Policy, each employee, subcontractor, intern, and volunteer must sign an acknowledgment form stating that they have read, understand, and agree to abide by the CTIP policy. SIL LEAD may also make available additional resources (such as CTIP training manuals and links to useful online videos).

### Reporting Process

SIL LEAD's Whistleblower Policy is in place to help ensure that reports regarding any violations (including CTIP violations) may be made without fear of retaliation. SIL LEAD's CTIP Policy Acknowledgment Form contains the required hotline and e-mail information (1-844-888-FREE or via e-mail at [help@befree.org](mailto:help@befree.org)). The CTIP Policy also details to whom reports should be made within SIL LEAD.

### Recruitment and Wage Plan

SIL LEAD does not currently use the services of any recruitment companies. SIL LEAD does not charge recruitment fees to prospective employees and the wages it pays meet applicable legal requirements in the United States and in project host-countries. If SIL LEAD contracts the services of a recruitment company, SIL LEAD will only contract with companies that have trained employees and that agree to not charge recruitment fees to prospective employees.

## **Housing Plan**

SIL LEAD does not currently provide housing to employees, consultants, interns, or volunteers.

Individuals traveling to and working in other countries on behalf of SIL LEAD are lodged at hotels or other appropriate lodging with rates that are in keeping with the per diem rates established by the U.S. State Department. If, in the future, SIL LEAD chooses to provide housing to its employees, a housing plan will be established which will require that all provided housing meet or exceed host country housing and safety standards.

## **Monitoring Procedures**

From time to time SIL LEAD's Executive Director, Project Managers, and other personnel may travel to project sites. During such visits they will seek to be vigilant of any indications of possible violations of CTIP or other policies. At other times, SIL LEAD relies on the reporting of other project staff (either from within SIL LEAD or from other project partners) of any alleged or actual violations of CTIP or other policies. SIL LEAD's CTIP policy clearly establishes the consequences for violations of its CTIP policy either by employees or subawardees (currently SIL LEAD has no relationships with subawardees).

## **Investigations**

If SIL LEAD receives any credible information regarding a violation or suspected violation of SIL LEAD and United States Government prohibitions on the trafficking of persons, SIL LEAD's Executive Director will immediately notify the Contracting Officer at the prime contracting agency (if SIL LEAD is serving as a subcontractor on a project) or the cognizant Agreement Officer and the USAID Office of the Inspector General (if SIL LEAD is serving as a prime contractor). SIL LEAD will fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons. SIL LEAD understands that the cognizant Agreement Officer (either directly or through the prime contracting agency) may direct SIL LEAD to take specific steps to abate any alleged violation or to enforce the requirements of this compliance plan.

## **Posting**

SIL LEAD will post this plan on its external website, [www.sil-lead.org](http://www.sil-lead.org) and at all fixed workplaces in the US or other countries.

## **B. Compliance History**

SIL LEAD is not aware of any past or current violations of its CTIP Policy. SIL LEAD is not aware of any internal or external reports of any alleged or actual incidents of trafficking in persons by our staff.

## **C. Due Diligence and Safeguards**

As mentioned above, SIL LEAD requires that all staff and contracted consultants review the Combating Trafficking in Persons Policy upon affiliation with SIL LEAD and on an annual basis while affiliated. The Executive Director and the Project Managers interact regularly with project staff and consultants to help ensure open channels of communication and to help ensure that the Combating Trafficking in Persons

Policy is not violated. The Executive Director and the Operations Director interact regularly with non-project related staff and consultants to this same end.

Open channels of communication are encouraged, strengthened, and protected by SIL LEAD's Whistleblower Policy which states that:

Reporting individuals are protected under the whistleblower provisions of the Sarbanes-Oxley Act of 2002 (Public Law 107-204), which makes it illegal to punish individuals who risk their careers by reporting suspected illegal or improper activities in an organization. It is contrary to the values of SIL LEAD for anyone to retaliate against any board member or staff member who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of SIL LEAD. A staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## **D. Monitoring and Remediation**

The Executive Director, Operations Director, and Project Managers monitors employees, subcontractors, volunteers and interns on an ongoing basis. The procedures for monitoring and dealing with violations or suspected violations of the Combating Trafficking in Persons Policies are as follows.

When an SIL LEAD staff member has concerns or suspicions of sexual exploitation or sexual abuse committed by a fellow worker, whether or not the person is affiliated with SIL LEAD, he or she must report such concerns in accordance with the procedures outlined in SIL LEAD's Whistleblower Policy.

Upon joining SIL LEAD, all staff will be notified of the United States Government's zero tolerance policy regarding trafficking of persons and of the following prohibitions:

1. Engaging in any form of trafficking in persons,
2. Procuring commercial sex acts,
3. Using forced labor, and
4. Acts that directly support or advance trafficking in persons.

SIL LEAD requires that subcontractors notify employees of the prohibited activities described in the previous paragraph of this section and the actions that may be taken against them for violations.

SIL LEAD will notify staff of the actions that will be taken against staff for violations of this policy and will impose suitable remedies, including termination, on staff and subcontractors that fail to comply with this policy.

SIL LEAD will notify the cognizant Agreement Officer and the USAID Office of the Inspector General of any CTIP violations related to a USAID award for which SIL LEAD is serving as a prime contractor or will notify the Contracting Officer of the prime contracting agency of any CTIP violations relating to a USAID award for which SIL LEAD is serving as a subcontractor, of:

1. Any information it receives from any source (including host country law enforcement) that alleges an SIL LEAD staff, subcontractor, or subcontractor employee involved in that project has engaged in conduct that violates this policy; and
2. Any actions taken against SIL LEAD staff, subcontractors, or subcontractor employees involved in that project pursuant to this clause.

The Executive Director, Operations Director, and Project Managers will investigate any allegations of violations relating to the trafficking of persons promptly and diligently. SIL LEAD will fully cooperate with any Federal agencies responsible for audits, investigations, or corrective actions relating to trafficking in persons.

*Approved by the Board of Directors of SIL LEAD on June 03, 2016*